

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**VIASAT, INC.,**

**Plaintiff,**

**vs.**

**WESTERN DIGITAL CORPORATION  
and WESTERN DIGITAL  
TECHNOLOGIES, INC.,**

**Defendants.**

**Case No.: 6:21-cv-01230-ADA**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S NOTICE OF INTENT TO PROCEED WITH VENUE DISCOVERY**

Plaintiff Viasat, Inc. files this Notice to inform all parties and the Court of its intent to proceed with venue discovery pursuant to the Court's April 14, 2022 Standing Order Governing Proceedings (OGP) 4.1 – Patent Cases and June 8, 2021 Amended Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases.

On August 4, 2022, Defendant Western Digital Technologies, Inc. filed a motion to transfer venue to the Northern District of California under 28 U.S.C. § 1404(a). Viasat opposes.

According to the Court's OGP, venue discovery “shall be completed no later than 10 weeks after the filing of [the venue] motion.” OGP at 5. “The deadline for plaintiff’s response is 2 weeks after the completion of venue or jurisdictional discovery. The deadline for Defendant’s reply is 2 weeks after the filing of the response.” *Id.*

Accordingly, Viasat hereby provides notice of its intent to proceed with venue discovery and briefing pursuant to the below schedule:

| Event                    | Deadline          |
|--------------------------|-------------------|
| Motion filed             | August 4, 2022    |
| Venue Discovery Cut-off  | October 13, 2022  |
| Viasat's Response Briefs | October 27, 2022  |
| Defendants' Reply Briefs | November 10, 2022 |

Dated: August 4, 2022

Respectfully submitted,

*/s/ Melissa R. Smith*

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**CERTIFICATE OF SERVICE**

I certify that, on August 4, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to all counsel of record.

*/s/ Melissa R. Smith* \_\_\_\_\_